

(Please type or print)

Submitted by: Claudia McCoy SC Bar Number: \_\_\_\_\_

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**DOCKETING INFORMATION** (Check all that apply)

☐ Emergency Relief demanded in petition      ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavits	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input checked="" type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

RETURN DATE: 1/18/12

SERVICE: OK

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January 17, 2012

**VIA OVERNIGHT DELIVERY**

Ms. Jocelyn G. Boyd  
Chief Clerk of the Commission  
South Carolina Public Service Commission  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210  
(803) 896-5100

RECEIVED  
2012 JAN 18 17:10:15  
SC PUBLIC SERVICE  
COMMISSION  
✓

Re: 1 800 Collect, Inc.  
Docket No. 2012-16-C

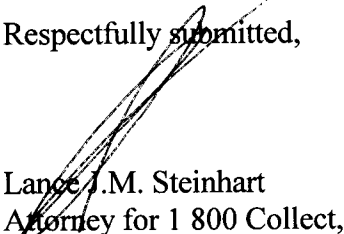
Dear Ms. Boyd:

Pursuant to letter dated January 11, 2012 in the above-referenced docket, enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

  
Lance J.M. Steinhart  
Attorney for 1 800 Collect, Inc.

Enclosures

cc: Lessie Hammonds – ORS via e-mail: [lhammon@regstaff.sc.gov](mailto:lhammon@regstaff.sc.gov)  
Scott Elliott via e-mail: [selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)  
Jackie Livingston via e-mail: [jlivingston@elliottlaw.us](mailto:jlivingston@elliottlaw.us)

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2012-16-C**

RECEIVED  
2012 JAN 18 4:10:15  
PUBLIC SERVICE  
COMMISSION

**IN RE: Application of 1 800 Collect, Inc.        )  
Authority to Operate as a Reseller of        )  
Interexchange Telecommunication Services    )  
Within The State of South Carolina and to    )  
be Regulated in Accordance with Procedures)  
Established for Alternative Regulation        )  
In Order Nos. 95-1 734 and 96-55 In        )  
Docket No. 95-661 -C.                        )**

**DOCKET 2012-16-C  
DATE JANUARY 17, 2012**

**I. Introduction**

- 1     1.     **Q.     Please state your name and business address.**
- 2           A.     My name is Brian Rhys. My business address is 1658 Gailes Boulevard, Suite B.,
- 3                 San Diego, California 92154.
- 4     2.     **Q.     By whom are you employed and in what capacity?**
- 5           A.     I am Treasurer of 1 800 Collect, Inc. ("1 800 Collect").
- 6     3.     **Q.     Please give a brief description of your background and experience in business**
- 7                 **and telecommunications.**
- 8           A.     My background and experience, as well as other members of the management team
- 9                 of 1 800 Collect, is set forth in Attachment 4 to our application.
- 10

1 4. **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to describe the nature of 1 800 Collect's proposed  
3 service offering within the State of South Carolina, and to demonstrate its financial,  
4 managerial, and technical ability to provide the telecommunications services for  
5 which authority is sought herein.

6 5. **Q. Do you wish to incorporate by reference any documents into your testimony?**

7 A. Yes. I wish to incorporate by reference the underlying Application filed in this  
8 proceeding and its associated attachments.

9 **II. The Business of 1 800 Collect**

10 6. **Q. Has 1 800 Collect registered to do business in South Carolina?**

11 A. Yes. 1 800 Collect is a Florida Corporation that has received authorization to  
12 transact business within the State of South Carolina. A copy of 1 800 Collect's  
13 Articles of Incorporation is attached to the Application as Attachment "1" and a copy  
14 of the document of authorization from the State of South Carolina is attached to that  
15 Application as Attachment "2".  
16

1     7.     **Q.     Please describe the services 1 800 Collect intends to provide within the State of**  
2                   **South Carolina.**

3             A.     1 800 Collect seeks authority to operate as a reseller of intraLATA and interLATA  
4                   intrastate telecommunications services to the public on a statewide basis. 1 800  
5                   Collect seeks authority to offer on a resale basis within South Carolina intrastate,  
6                   interLATA and, to the extent authorized by the Commission, intraLATA direct-  
7                   dialed services including alternate operator telecommunications services. 1 800  
8                   Collect will handle operator-assisted calls, such as collect, third party billed, person-  
9                   to-person and credit card calls from payphone locations and other traffic aggregator  
10                  locations, such as hotels and hospitals. 1 800 Collect will not provide service to  
11                  correctional/confinement facilities. Calls will be completed by either a live operator  
12                  or an automated service, and services will be available 24 hours per day, & days per  
13                  week. 1 800 Collect seeks statewide authority to provide intraLATA services  
14                  authorized by the Commission in Docket Nos. 92-182-C, 92-183-C, and 92-200-C  
15                  and to be regulated in accordance with procedures established for alternative  
16                  regulation in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C. 1 800  
17                  Collect has no plans at this time to construct any telecommunications transmission  
18                  facilities of its own and seeks no construction authority. 1 800 Collect will operate  
19                  exclusively as a reseller. 1 800 Collect intends to engage in "switchless" resale. 1  
20                  800 Collect will arrange for the traffic of underlying subscribers to be routed directly  
21                  over the networks of Applicant's network providers.

22     8.     **Q.     What carrier will 1 800 Collect utilize as its underlying carriers for services in**  
23                   **South Carolina?**

24             A.     1 800 Collect intends to utilize AT&T nad Qwest and similar companies as its  
25                   underlying carriers. 1 800 Collect will choose its underlying carriers based upon the

1 quality of service of the carrier properly certified by the Commission to provide such  
2 service.

3 9. Q. Does 1 800 Collect currently provide intrastate telecommunications services in  
4 any other state?

5 A. No. 1 800 Collect does not currently provide service in any state .

6 10. Q. Has 1 800 Collect ever had an application for a certificate of public convenience  
7 and necessity denied?

8 A. No.

9 11. Q. Does 1 800 Collect intend to file a tariff with the Commission?

10 A. Yes. 1 800 Collect filed a tariff along with its Application in this proceeding which  
11 it will modify as necessary in order to meet the Commission's requirements. We  
12 believe 1 800 Collect's Tariff will comport with all Orders, Rules, and Regulations  
13 of the Commission.

14 12. Q. Will 1 800 Collect comply with the Commission's orders regarding the resale of  
15 interexchange carrier services?

16 A. Yes. 1 800 Collect will at all times provide and market interexchange carrier  
17 services in accordance with current Commission policies. In addition, 1 800 Collect  
18 at all times will provide interstate services in compliance with all FCC rules and  
19 regulations.  
20

1 13. Q. Has 1 800 Collect provided any intrastate telecommunications services within  
2 the State of South Carolina?

3 A. No it has not.

4 14. Q. What rates will 1 800 Collect charge upon receipt of certification?

5 A. 1 800 Collect will charge the tariffed rates approved by the Commission.

6 15. Q. How will 1 800 Collect market services in South Carolina?

7 A. 1 800 Collect intends to market its services via direct sales by 1 800 Collect's  
8 employees and independent sales agents. 1 800 Collect, Inc. intends to market via  
9 direct sales with traffic aggregators such as hospitals and hotels and Mobile Phone  
10 Operators.

11 III. Managerial, Technical and Financial Qualifications

12 16. Q. Does 1 800 Collect have sufficient managerial, technical, and financial  
13 resources and ability to provide the telecommunications services proposed in its  
14 Application?

15 A. Yes. 1 800 Collect has sufficient technical, financial, and managerial resources and  
16 ability to provide the telecommunications services for which authority is sought  
17 herein. 1 800 Collect's personnel represent a broad spectrum of business and  
18 technical disciplines, possessing many years of individual and aggregate  
19 telecommunications experience.

20 My qualifications and experience are discussed on Attachment 4 to our  
21 application, which attachment also supports Applicant's managerial and technical  
22 ability to provide the services for which authority is sought herein.

23

1 17. Q. How does 1 800 Collect handle customer service requests?  
2 A. 1 800 Collect's customer service department handles all such requests. 1 800 Collect  
3 can be reached by toll free number.

4 18. Q. Please describe the financial condition of 1 800 Collect.  
5 A. In support of 1 800 Collect's financial ability to provide the services sought herein, 1  
6 800 Collect's Balance Sheet Summaries as of January 31, 2010 and January 31, 2011  
7 and Income Statement summaries for the periods ended February 1, 2009 to January  
8 31, 2010 and February 1, 2010 to January 31, 2011 was submitted as Attachment 5  
9 to the Application.

10 IV. Public Interest

11 19. Q. How will residents of South Carolina benefit from 1 800 Collect's services and  
12 presence in South Carolina?

13 A. Commission approval should bring the following long-term benefits to telephone  
14 users:  
15 (1) More competition, additional services and a better product at industry  
16 competitive prices;  
17 (2) Increased consumer choice as well as innovative telecommunications  
18 services;  
19 (3) Efficient use of existing communications resources as well as increased  
20 diversification and reliability of supply of communications services;  
21 (4) Development of an expanded telecommunications supply industry in South  
22 Carolina;



1 (5) An expanded tax base and revenue source for the State of South Carolina;  
2 and,

3 (6) Additional sources of revenues for Local Exchange Companies through  
4 access charges and billing and collection fees.

5 20. Q. **Has the Company ever been the subject of an investigation by any state**  
6 **Regulatory body or by the FCC?**

7 A. No.

8 21. Q. **Will the Company agree to abide by and comply with the Commission's**  
9 **Rules and Regulations and Commission Orders in its operations in South**  
10 **Carolina?**

11 A. Yes.

12 22. Q. **Does this conclude your testimony?**

13 A. Yes. I would like to thank the Commission for this opportunity to provide  
14 information relevant to 1 800 Collect's Application and am ready to provide any  
15 additional information that the Commission may need in making its decision.  
16